

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	MB Docket No. 04-261
	)	
Violent Television Programming	)	
And It's Impact on Children	)	

NOTICE OF INQUIRY (NOI)

Comments from Richard Kahlenberg

I am pleased to have this opportunity to submit comments to the FCC concerning violent television programming and the related issue of the usefulness of the v-chip.

My comments are based on the insights I have gained during 15 years of publishing of weekly television viewing recommendations parents with children of elementary, middle and high school age. A record of these selections is available in the archive sections of the following websites (search using my name, "tvsmarts" or "mediamenu"):  
[www.latimes.com](http://www.latimes.com) (Los Angeles Times), [www.ask.com](http://www.ask.com) (Ask Jeeves),  
[www.whyville.net/mediamenu](http://www.whyville.net/mediamenu) (Whyville Times) and [www.hnma.net](http://www.hnma.net) (Los Angeles' Hollywood High School New Media Academy) The standards and curricula I use for reference are those compiled and published online by State education authorities. California, New York and the District of Columbia have the strictest standards, widely copied in other states.

The text of the current weekly list -for October 11-17, 2004 ( appended below) - serves as an example. These columns appear under an introduction stating "Some broadcast and cable programs contain material included in the public school curriculum and on standardized examinations. Here are this week's home viewing recommendations.

Some programs I have recommended have contained violent material when it was unavoidable – as is the case with historical documentaries and dramas, certain scientific programs and dramatizations of classic literature. Examples have been "Schindler's List, "Henry V" and "Ken Burns' Civil War".

In such cases I prefaced the recommendation with a notation warning parents to exercise discretion in allowing their children to watch. The selection of the program in the first place depended on whether it was an accurate and educationally valuable presentation of material specified in public school learning standards and curriculum. I am well aware of the Government's v-chip mandate, and the activities

now underway by the FCC to find necessary solutions to the issue of violence on television.

My years of comparing school standards and curricula to material broadcast at times when children are likely to be watching have given me unique insights into program ratings and the potential of the v-chip. Parents, educators and the community in general will benefit if the FCC supports efforts to rate programs based on the level of violent content and encourages promotion of the public use of the v-chip to block children from exposure to inappropriate material. At the same time, there are a number of other ratings that the v-chip technology can handle, such as the E/I and other positive designations that are worthy of FCC consideration. Parents who want to guide their children to programs that support academic performance could use these positive ratings.

### **Concerning the positive use of v-chip technology**

In keeping up to date with FCC activities in this area I have become familiar with the work of Mr. Tim Collings, who is not only the inventor of the v-chip but who has been actively involved in assisting organizations understand the potential in maximizing the value of this tool.

He has pointed out aspects of current v-chip technology that allow for automatic electronic selection of programs rated as having positive content. I have read his explanation of this process as contained in his comments related to FCC Docket No. 04-261. I believe this aspect of the v-chip technology is of interest to parents and educators wanting to enhance the educational value of the television their children watch.

Broadcasters and cable network producers currently assign parental advisory ratings to programs, publish these online, in newspapers and occasionally put them into the program signal to be accessed by v-chip technology. The producer's staff assigning these ratings is familiar with existing tv ratings as well as current broadcast Standards & Practices and FCC regulations. Presumably this staff, augmented by experts familiar with educational theory and standards, could assign additional v-chip ratings such as Mr. Collings speaks of – showing levels of educationally positive content.

Mr. Collings contends, and I understand the Consumer Electronic Association backs this up, that a TV or other v-chip equipped receiver operating the v-chip program would, if parents activated it, automatically switch to a desired program. In fact the TV or other device would automatically switch itself on at the time its v-chip has been set to select a desired program.

### **Response to the Part III of the FCC's NOI about Violence on Television.**

I am responding to the request in Paragraph 29 for comments on “television programming that may have a positive influence on individual behavior, especially educational and informational material”. These comments were originally prepared for publication in the Whyville Times, an online newspaper that publishes one of my weekly viewing suggestions for middle school age children and their parents.

(Begin comments originally submitted to Whyville Times)

### **Selecting programs for viewing**

Educational programming can be selected the same way a sports coach chooses food for the training diet for his or her team during the sports season. Some foods have valuable contents you can load up on when you are off the field – so you will perform well when you’re on the field. Those things go on the list.

So I prepare a weekly home viewing menu of upcoming broadcast and cable programs containing valuable material (food for the mind if you will) that can be useful in class and competitive exams (such as high school exit and college entrance exams).

Almost everybody has TV, and there are a lot of valuable and interesting programs available. The range is as broad as the alphabet... astronomy, biology, chemistry, foreign language, geography, and history all the way to zoology. I put together a menu of suggestions by checking out what’s included on state and national school curriculums which are available on the internet and also checking out what kids and teachers tell us about information they wish had been available when competitive exams were recently administered in their schools.

These State and National exams tests come almost monthly in the U.S. – separately from regular class tests. Schools now devote a lot of time teaching about competitive test-taking techniques. What’s on the test and what’s in the curriculum is not always the same. It’s like finding out, in the middle of a sports game, that you have to throw out the regular plays and improvise new ones, making you wish out had looked into a range of alternatives just in case.

Recent research about the learning habits of children points out two hours of television or other video-based material should be the daily maximum. Mental and physical health can be negatively affected by exposure beyond that level. As in studies into children’s food consumption, too much, and particularly too much of the wrong kinds of food, harms the child’s mental and physical health.

So, given the two hours of daily television viewing, what should you choose to get the best value for time spent? Finding programs to list involves checking the media schedules to find out what is available, what will air, come on the web or be released on video or in theatres in the coming week. Many programs of value are

repeated several times after they first air, so children will have the opportunity to construct their viewing week to take maximum advantage of each day's program list.

What we do can be an example for teachers. On their own they could mark their own TV guides and provide a rich content environment for their students – based on what they know about each student. TV programs viewed at home do not replace classroom teaching, but rather stimulate it. TV can provide background information about classroom subjects presented in ways expanding the child's understanding.

The importance of such background knowledge has been documented by educational researcher Robert J. Marzano. In his 2004 book "Building Background Knowledge for Academic Achievement: Research On What Works In Schools" he found, "The research literature supports one compelling fact: what students already know about the content is one of the strongest indicators of how well they will learn new information relative to the content."

(end comment for Whyville Times)

It is my hope that these comments in the matter of the NOI on TV Violence will be of use to the FCC in its efforts to encourage programming choices that will have a positive effect on children's development.

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#### Appendix A (weekly viewing suggestions for October 11-17, 2004)

"Some broadcast and cable programs contain material included in the public school curriculum and on standardized examinations. Here are viewing suggestions for October 11-17, 2004"

Monday, October 11

"Maya & Miguel" (Language Arts, Elementary and Middle School, PBS, 3-3:30 pm E/P –check for local times which may be earlier or later) This new animated daily series presents culture and language learning as fun, relevant and rewarding for all children, with a special emphasis on the Latino population. It chronicles the adventures of 10-year-old twins Maya and Miguel Santos and features their family, friends and a richly diverse neighborhood. An accompanying website in English and Spanish <http://pbskids.org/mayaandmiguel/flash.html> provides lessons based on word play through conversational language activities to build confidence and increase proficient language skills for Early English Language Development.

Tuesday, October 12

“Decisions That Shook The World” (American History. Middle and High School, Discovery Channel 8-9 pm E/P) This is the initial episode of a documentary miniseries about Presidential decisions. This one is set in the 1960s when the end of racial segregation was on the horizon. It explains how and why the son of the South, President Lyndon Johnson, championed the controversial Civil Rights Movement, and the far ranging impact his actions had on domestic and foreign affairs. The next episode, about Ronald Reagan’s role in ending the Cold War, airs October 19. Franklin Roosevelt’s preparations for America’s entry into WWII, begun years prior Pearl Harbor, are described in the program airing October 26.

“Frontline: The Choice 2004” (Current History, Middle and High School, PBS, 9-11 pm E/P – check local listings) This program, a dual biography of George W. Bush and John Kerry, goes beyond political rhetoric and campaign packaging to explore how the candidates and their values have been shaped by family background, history, victory, and defeat.. (The program repeats on PBS October 16 and November 1.) There’s a website with more details at <http://www.pbs.org/wgbh/pages/frontline/shows/choice2004>.

Wednesday, October 13

“Presidential Debate” (Current History, Middle and High School, ABC, CBS, FOX, NBC, PBS and cable news channels, 9-11 pm ET, 6-8 pm PT) George W. Bush and John Kerry meet in their final campaign debate. The site is Arizona State University, and the focus is domestic issues.

Thursday, October 14

“Alexandra Pelosi’s Diary Of A Political Tourist” (Current History, High School, HBO, 6:20-8 pm E/P) This is documentary filmmaker Alexandra Pelosi’s (daughter of Congresswoman Nancy Pelosi) chronicle of her two-year road trip on the Democratic campaign trail following presidential hopefuls. Everybody knows what candidates have to do in their public quest to earn the nomination for President of the United States. But who were the people behind -Gen. Wesley Clark, Howard Dean, John Edwards, Dick Gephardt, Bob Graham, Dennis Kucinich, Joe Lieberman, Rev. Al Sharpton and John Kerry?

“Paths Of Glory” (World History, High School, Turner Classic Movie Channel, 10pm-midnight ET, 7-9 pm PT, repeats October 16<sup>th</sup> at 4 pm ET, 1 pm PT) Available on video) Senator John McCain, R-Arizona, will discuss this 1957 drama of French soldiers on a futile mission during World War I. McCain cites the film's stark examination of the human toll during wartime, thereby emphasizing the gravity of holding public office. In this multiple-Oscar-nominated film a military lawyer comes to question the status quo when he defends three men accused of cowardice. More info at the website: <http://www.turnerclassicmovies.com/ThisMonth/Article/0,,81889|83306||,00.html>

Friday, October 15

“Modern Marvels: The Wheel” (Science and Technology, Elementary, Middle and High School, History Channel, 7-8 pm E/P) The history of civilization has turned on the wheel, and we have traveled as far as we have because of it. One of the six simple machines and perhaps the most important invention in the history of mankind, the wheel has been essential in all aspects of life--from farming to fighting, traveling to trading. This documentary features interviews with scientists, historians, philosophers, millers, potters, and spinners.

Saturday, October 16

“Taking Care Of Business” (Mathematics and Economics, High School, TLC-The Learning Channel, 10-11 pm E/P) This documentary delivers a double dose of “reality TV”. It utilizes the customary hidden cameras. Plus, it probes the cold, hard world of business. You will watch a team of outside experts armed with fresh ideas swoop into a business that’s in trouble. Their goal is to move things from ‘in the red’ to ‘in the money’ - turning things around financially and helping the owners achieve success. In this premiere episode of a new weekly series on this theme, the business shown is the Microchip Café. Owners Patty and Gabe are coping with having combined five businesses into one location – computer classes, computer repairs, Internet access, a gaming room and a juice bar/café. The experts’ challenge is to reorganize the space to give it some ‘curb appeal’.

Sunday, October 17

“Mummy Detectives: Crypt Of the Medici” (World History, Medical Technology, TLC-The Learning Channel, 9-10 pm E/P) This documentary follows a team of scientists as they open the burial crypts of the famous, ancient, rich, powerful – and large - Medici family and use the latest forensic technology to investigate how they lived and died. The scientists turned up so many revelations about who actually murdered who to settle family conflicts or inherit family fortunes or who died from bad medical treatment, etc, that scenes of this film were shown on “CBS 60 Minutes” last week. Details about this news-that’s –still- news after 500 years at <http://www.cbsnews.com/stories/2004/10/01/60minutes/main646857.shtml> and also <http://www.guardian.co.uk/italy/story/0,12576,1256459,00.html>

“The Lost Prince” (World History, High School, PBS, 9-11pm E/P) This is Part 1 of a 2-part drama based on the real-life story of Prince John, the current Queen of England's uncle, who as a young boy was shut away due to epilepsy and a learning disability. (Part 2 airs October 24) For a description of his life, and the world events to which he was witness log on <http://www.pbs.org/wgbh/masterpiece/lostprince/synopsis>. It, and the program present John as a charming and attractive boy, with an eccentric view of the world and uninhibited in a way that is alien to his parents. But ailing grandfather, King Edward VII, loves him for his frankness. It is clear also that his nanny, Lalla, is

reluctant to reveal the seriousness of his medical condition. Then, at Edward VII's funeral, attended by all the heads of state of Europe, including the sinister Kaiser Wilhelm, Johnnie succumbs to a serious epileptic fit. Queen Mary, Johnnie's mother, summons doctors to examine him and their diagnosis confirms her and Lalla's worst fears. Lalla volunteers to look after Johnnie to prevent him being sent to an institution. The two of them are to be sent to Sandringham, where Johnnie is to be prevented from encountering anybody but the closest members of his family.. Then one day, to the acute embarrassment of King George V and Queen Mary, he speaks his mind at a tea party held for Prime Minister Asquith and his Foreign Secretary, Lloyd George. Johnnie is summoned to London to be re-examined by the doctors. During his stay he is taken by his brother George up to the minstrel's gallery looking down on the banqueting hall of Buckingham Palace, to observe a grand state occasion. The assembled dignitaries are chattering feverishly about the poise with which the Queen has dealt with the intrusion of a suffragette, who has confronted the Queen to demand her support for women's emancipation. During the banquet Asquith and Lloyd George are called back to Downing Street to receive the news that is to prove to be the catalyst for the start of the First World War.

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